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> UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE Hunter Williams

Chapter 13

Docket: 15-14288elf

RESPONSE TO MOTION TO FOR RELIEF

Debtor admits to failing to make all post petition mortgage payments and

requests that he be allowed to cure all post petition arrearages within 6 months.

WHEREFORE, Respondent requests that the Court deny the relief requested by

Movant mortgage/assignee and enter an order allowing debtor to cure all post

petition arrearages.

Respectfully,

/s/ RICHARD N LIPOW RICHARD N LIPOW ATTORNEY FOR DEBTOR 629 SWEDESFORD ROAD MALVERN PA 19355

Certificate of Service

The undersigned certifies that the foregoing on the Chapter 13 and US Trustees and creditor's counsel at the time the document was electronically filed by the ECF system.

Respectfully,

/s/ RICHARD N LIPOW RICHARD N LIPOW ATTORNEY FOR DEBTOR 629 SWEDESFORD ROAD MALVERN PA 19355